

Remarks

Claims 1, 4-8, 11-13, 15-19 and 21 are pending. By this Amendment, claims 8 and 18 have been amended. No new matter is believed to have been added.

The amendments of claims 8 and 18 are being made according to the suggestion of the Office regarding the preambles of claims 8 and 18. (Office Action at page 4).

Applicants submit that the original claims 8 and 18 and the specification provide antecedent basis for the amendments. In addition, entry of the amendments is proper under 37 C.F.R. §1.116(b) because the amendments: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of the amendments.

In the Office Action, claims 8 and 18 are rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. By this Amendment, claims 8 and 18 have been amended to incorporate the suggestion of the Office. Accordingly, Applicants respectfully request withdrawal of the rejection.

In the Office Action, claims 1, 4-8 and 11 were rejected under 35 USC 103(a) as being unpatentable over Wu et al. (US 6,614,936), hereinafter "Wu," in view of Mishima et al. (US 5,488,418), hereinafter "Mishima," and further in view of Strongin et al. (US 5,872,866), hereinafter "Strongin"; claims 12-13, 15-19 and 21 were rejected under 35 USC 103(a) as being unpatentable over De Bonet et al. (6,510,177), hereinafter "De Bonet," in view of Strongin. Applicants submit that the claimed subject matter is allowable for the reasons stated below.

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To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. In this case, Applicants submit that the Office fails to establish a *prima facie* case of obviousness.

With regard to claims 1, 8, 11-12, 18 and 21, Applicants submit that the cited prior art fails to teach or suggest each and every claimed feature. For instance, with regard to claims 1, 8 and 11, the claimed invention includes, *inter alia*, "selecting only one of the DCT modules for performing DCT computation based on factors including an available level of computing resources[.]" as recited in claim 1 and claimed similarly in claims 8 and 11. As the Office admits, Wu and Mishima do not disclose or suggest this feature. (Office Action at page 6). Contrary to the Office's assertion, Applicants submit that Strongin also does not disclose or suggest "selecting only one of the DCT modules for performing DCT computation[.]" (Claim 1). Rather, Strongin only discloses selecting IDCT procedures. (See, e.g., FIG. 6 and col. 13, lines 34-36.) In addition, Strongin does not select IDCT procedures based on factors including an available level of computing resources, as will be discussed below. In view of the foregoing, the suggested combination of the cited prior art does not disclose or suggest "selecting only one of the DCT modules for performing DCT computation based on factors including an available level of computing resources[.]" (Claim 1).

Moreover, contrary to the Office's assertion, Mishima does not disclose or suggest "selecting only one of the DCT modules for performing DCT computation[.]" (Claim 1; similarly claimed in claims 8 and 11; emphasis added). In Mishima, only "outputs of the DCT circuits 77 are switched by the switch 79." (Col. 24, line 30). That is, in Mishima, all DCT circuits 77 have already performed DCT computations and generated outputs before the switch of the outputs. In view of the foregoing, Mishima does not select only one of the DCT modules for performing DCT computation. Wu and Strongin also do not disclose or suggest this feature, as discussed above.

Further, contrary to the Office's assertion, Mishima does not disclose or suggest that "each of the plurality of DCT modules comprises a different precision[.]" (Claim 1; similarly claimed in claims 8 and 11). Specifically, Mishima does not disclose or suggest that each DCT circuit 77 comprises its own precision. Wu and Strongin also do not disclose or suggest this feature.

With regard to claims 12, 18 and 21, De Bonet and Strongin do not disclose or suggest, *inter alia*, "a selection system for selecting one of the IDCT modules based on factors including an available level of computing resources." (Claim 12; similarly claimed in claims 18 and 21). In Strongin, the selection of an optimal IDCT procedure is only "[b]ased on the number of non-zero coefficients" (col. 13, line 33; *see also* col. 13, lines 34-36) and whether "the bitstream DCT coefficients are substantially similar to saved common DCT coefficients" (col. 11, lines 36-38). As such, Strongin does not disclose or suggest selecting one of the IDCT modules based on "factors including an available level of computing resources" as included in the claimed invention. As the Office admits, De Bonet also does not disclose or suggest this feature. In view of the

foregoing, the combination of De Bonct and Strongin does not disclose or suggest “selecting one of the IDCT modules based on factors including an available level of computing resources.” (Claim 12).

Furthermore, with respect to claims 1, 8 and 11, Applicants submit that there is no suggestion or motivation to combine the cited prior art. For example, Mishima discloses switching outputs of the DCT circuits, after all the DCT circuits have already performed the DCT computation. On the contrary, Strongin selects IDCT procedures before conducting the IDCT computation. As such, the basic operation principles of Strongin and Mishima contradict each other. As a consequence, no reasonable expectation of success exists in Strongin and Mishima to combine the same. Applicants submit that the Office can obtain suggestion or motivation to combine the cited references only from the hindsight teachings of the claimed invention. In view of the foregoing, there is no suggestion or motivation to combine Wu, Mishima and Strongin.

In view of the foregoing, the Office fails to establish a *prima facie* case of obviousness. Accordingly, Applicants respectfully request withdrawal of the rejection.

The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

Conclusion

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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Dated: 3/1/06

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